

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CHRISTOPHER WHITE, WILLIAM SUITOR
and DARLENE SCHMIDT individually and on
behalf of all others similarly situated,

No. 15-cv-438(LJV)(HKS)

DECLARATION

Plaintiffs,

- against -

FEIN, SUCH AND CRANE, LLP,

Defendant.

**Declaration of Jordan Zeranti in Support of Plaintiffs'
Opposition to Defendant's Motion for Summary Judgment**

Under 28 U.S.C. § 1746, I, Jordan Zeranti, Esq., do hereby declare under penalty of perjury, that the following is true and correct:

1. I am an attorney at the Western New York Law Center, Inc.
2. I am submitting this Declaration in support of Plaintiffs' opposition to Defendant's motion for summary judgment.
3. On May 8, 2018, I used the Erie County Clerk's Online Public Record Search Page, located at http://ecclerk.erie.gov/recordsng_web/, to search for Lis Pendens filings by Fein, Such & Crane, LLP.
4. I narrowed the search by entering Party Name: Fein Such & Crane, Document Type: 351 Lis Pendens, and Date Range: 01/01/2014 to 12/31/2016.
5. According to the Erie County Clerk's Online Public Record Search Page, Fein, Such & Crane, LLP filed 819 Lis Pendens in Erie County from January 01, 2014 through December 31, 2016.

6. According to the Erie County Clerk's Online Public Record Search Page, Fein, Such & Crane, LLP filed 337 Lis Pendens in Erie County from January 01, 2014 through December 31, 2014. See **Exhibit 1**.

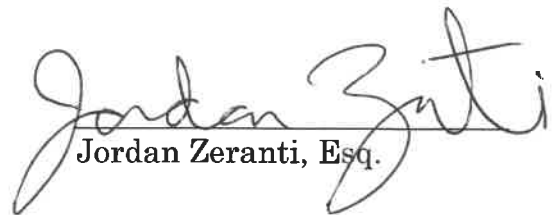
7. According to the Erie County Clerk's Online Public Record Search Page, Fein, Such & Crane, LLP filed 253 Lis Pendens in Erie County from January 01, 2015 through December 31, 2015. See **Exhibit 2**.

8. According to the Erie County Clerk's Online Public Record Search Page, Fein, Such & Crane, LLP filed 229 Lis Pendens in Erie County from January 01, 2016 through December 31, 2016. See **Exhibit 3**.

9. Attached hereto as **Exhibit 4** are 36 randomly selected summons and complaints for the years 2014, 2015, and 2016; twelve for each year.

Under 28 U.S.C. § 1746, I, Jordan Zeranti, Esq., do hereby certify under penalties of perjury, that the above statements are true and correct to the extent they reflect my personal knowledge and otherwise are based upon my information and belief.

Dated: Buffalo, New York
May 9, 2018


Jordan Zeranti, Esq.